



## Consultation on Waste Management Policy and review of Guideline

The Victorian Government is committed to ensuring that combustible recyclable and waste materials at waste and resource recovery facilities are managed and stored in a manner that minimises risks to human health and environment from fire.

In pursuit of that goal, the interim *Waste Management Policy (Resource Recovery Facilities)* places requirements on sites that manage combustible recyclable and waste materials (CRWM). Compliance with the policy can be achieved either by following EPA's *Management and storage of combustible recyclable and waste material – Guideline* (Publication 1667.1), or through an approach that minimises the risk from fire to an equivalent level.

Commencing in August last year, this interim policy is set to expire in August 2018. The Victorian Government proposes to declare an ongoing Waste Management Policy (Combustible Recyclable and Waste Material) to take effect from 29 August 2018. As part of that process, DELWP and EPA are seeking public feedback.

We have set up an [online forum](#) and strongly encourage interested members of the community to contribute.

This update summarises some of the public insights we have gathered so far.

### Who we've spoken to

- Local councils in the North East, Goulburn Valley, Melbourne Metropolitan, Grampians Central West, Barwon South West, Loddon Mallee and Gippsland Waste and Resource Recovery Group regions
- Industry representatives and waste and resource recovery facility operators via the Victorian Waste Management Association (VWMA)
- Broader community and industry groups including composters, e-waste recyclers, manufacturers of recycled products, metal recyclers, parts recyclers, representatives from EPA's Community Reference Group, Victorian Automobile Chamber of Commerce (VACC), Victorian Chamber of Commerce and Industry, waste and resource management groups and waste to energy operators.

### What we've heard

#### Policy considerations

- The definition and composition of combustible recyclable and waste materials needs to be clearer about what this does and does not include
- The policy should also apply to manufacturers who produce and store combustible wastes on site
- The end products of metal recycling processes shouldn't have to comply with the policy, as they pose minimal risk compared to unprocessed waste or the shredder floc generated through processing
- Site fire risk assessment and fire management plans are minimum compliance requirements, and should be covered in the policy
- Is the objective to minimise fires or the impacts of fires?

#### Guideline considerations

- There is confusion around roles and responsibilities of owners and operators of resource recovery facilities, particularly where the guideline requirements are quite prescriptive

- The guideline might be more appropriate for larger metropolitan resource recovery facilities and may be less applicable to smaller regional operators and councils
- Risk assessment capabilities and expectations vary widely within the industry, and the risk assessment section in the guideline doesn't provide enough information for many duty holders to feel comfortable undertaking fire risk management at their site
- Information in the guideline needs to align with and point to requirements and guidance from other authorities, for example around storage of waste
- The guideline should provide clear compliance requirements for indoor storage of CRWM
- The use of the term "stockpile" is confusing, when does storage of waste become a stockpile?
- There is a need for support tools and information from relevant authorities to help complete risk assessments and fire management plans, or to demonstrate that existing OHS procedures are compliant
- The role of the checklist as a support tool received both negative and positive feedback
- More information about ignition sources, and guidelines to provide clear compliance requirements, would be desirable
- The obligations of trained staff in fighting fires at resource recovery facilities are unclear

#### Considerations outside the scope of the policy update and guideline review

- The journey to compliance can be resource intensive and timelines for remediation need to be realistic
- Duty holders are concerned about subjectivity in interpreting compliance
- The message and information provided must be consistent across relevant authorities

We are working to consolidate information and existing guidance across relevant authorities to ensure that the message to duty holders is consistent. Providing additional clarity about duty holder requirements in the guideline should alleviate concerns around interpretation of compliance with the policy.

## Get involved

- Visit the Engage Victoria website **before 1 August 2018**
- Email EPA's Resource Recovery Taskforce on [taskforce@epa.vic.gov.au](mailto:taskforce@epa.vic.gov.au)
- Email DELWP's Waste and Resource Recovery Team on [wastepolicy@delwp.vic.gov.au](mailto:wastepolicy@delwp.vic.gov.au)